

# FairLaw Firm

## INVOICE

Open (Not Sent)

Invoice # 677

Invoice Date: 1/14/2025

Due Date: [REDACTED]

Amount due  
88,955.70

**FairLaw Firm**  
135 San Lorenzo Avenue  
Suite 770  
Coral Gables, FL 33146  
Phone: +13052304884  
Email: [intake@fairlawattorney.com](mailto:intake@fairlawattorney.com)  
Website: <https://fairlawattorney.com/>

To:  
Maria Elena Chavez Letona  
[REDACTED]

## Services

### Timekeeper Rates Used:

Brian H. Pollock, Esq.	\$500/hour
P. Brooks LaRou, Esq.	\$325/hour
Steffany Sanguino (Paralegal)	\$165/hour

Date	Staff Member	Category	Description	Duration	Total
10/10/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Initial intake with Ms. Chavez Letona; discuss her claim, what to expect, and review sign-up procedures	1.00	500.00
10/19/2023	Luna Alvey Esq.	Draft/revise	Draft and send by email Preservation Letter to Client eng and spa	0.40	160.00
10/19/2023	Luna Alvey Esq.	Draft/revise	Draft/ send email to client requesting Docs	0.30	120.00
10/20/2023	Steffany Sanguino	Paralegal	Bank statements and text messages have have been received and downloaded.	0.50	82.50
10/24/2023	Steffany Sanguino	Paralegal	I spoke with the client and her daughter about the address where she worked and the date she started working there.	0.30	49.50
10/25/2023	Steffany Sanguino	Paralegal	I spoke with the client about her experience working for Aminta	0.50	82.50
10/25/2023	Steffany Sanguino	Paralegal	Text Messages with Aminta have been received.	0.40	66.00
10/31/2023	Steffany Sanguino	Paralegal	I called the client to f.u with documents. She said she would double-check and get back to us.	0.20	33.00
11/3/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of letter from Mr. Perez in response to the FMWA demand letter	0.30	150.00
11/7/2023	Brian H. Pollock Esq.	Draft/revise	Draft Complaint for FLSA-MW, FLSA-OT, and FMWA	1.20	600.00
11/8/2023	Steffany Sanguino	Paralegal	Summons and CCV have been drafted—Pending Brian's approval to file.	0.60	99.00
11/8/2023	Steffany Sanguino	Paralegal	Summons and Civil Cover sheets have been modified and sent to be filed.	0.30	49.50
11/9/2023	Luna Alvey Esq.	Draft/revise	draft letter to client re: Case filed and what to expect eng and spa	0.40	160.00
11/9/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Clerk's Notice of Judicial Assignment (Judge Moreno and Magistrate Judge Otazo-Reyes)	0.10	50.00
11/9/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt and review of Summons issued by the Court; then, draft email to process server with instructions for service on each Defendant	0.30	150.00
11/10/2023	Luna Alvey Esq.	Draft/revise	Draft notice of appearance.	0.10	40.00
11/14/2023	Steffany Sanguino	Paralegal	The return of service has been received, and the Notice of Service has been drafted and filed.	0.60	99.00
11/14/2023	Luna Alvey Esq.	Receipt, Review, and Analysis	Receipt, review and analysis of Notice of Court Practices in FLSA cases.	0.10	40.00
11/16/2023	Steffany Sanguino	Paralegal	File review.	0.10	16.50
11/17/2023	Steffany Sanguino	Paralegal	I emailed Steve to f.u with service on Sweet Living Facility and Zelira Quinonez	0.20	33.00
11/17/2023	Steffany Sanguino	Paralegal	I called the client to request a list of her witnesses.	0.20	33.00
11/21/2023	Steffany Sanguino	Paralegal	I called the client to f.u with her witnesses list. She provided me with their information.	0.50	82.50

11/28/2023	Luna Alvey Esq.	FLSA - Plaintiff	Revise statement of claim.	0.80	320.00
11/28/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Revise the calculations for the Statement of Claim.	0.60	300.00
11/28/2023	Steffany Sanguino	Paralegal	I called the client and spoke with her and her daughter about the estimate on the statement of claim. They both approved the amounts.	0.50	82.50
11/29/2023	Steffany Sanguino	Paralegal	The summons and complaint have been served to Zelmira Quinonez. Notice of Service has been filed.	0.40	66.00
11/29/2023	Steffany Sanguino	Paralegal	The summons and complaint have been served to Sweet Living Facility. Notice of Service has been filed.	0.40	66.00
12/1/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Exchange emails with Mr. Perez re: his request for an extension of time, agree to same, and provide him with the FLSA Order and Statement of Claim	0.30	150.00
12/1/2023	Brian H. Pollock Esq.	Draft/revise	Draft N/Compliance (with ECF No. 8)	0.30	150.00
12/4/2023	Luna Alvey Esq.	Receipt, Review, and Analysis	Receipt, review and analysis of Defendant's unopposed motion to file response to Complaint with proposed order attached.	0.30	120.00
12/4/2023	Luna Alvey Esq.	Receipt, Review, and Analysis	Receipt, review and analysis of Notice of Appearance.	0.10	40.00
12/4/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Paperless Order Granting Defs' MET to Respond to Complaint	0.10	50.00
12/5/2023	Luna Alvey Esq.	Receipt, Review, and Analysis	Receipt, review and analysis of order granting Defendant's motion for extension of time to respond to complaint	0.10	40.00
12/11/2023	Brian H. Pollock Esq.	Email Communication	Exchange emails with Mr. Perez re: a 5-day extension of time to respond to the Complaint for the remaining Defendants; respond by agreeing to same and requesting he do so by motion (as agreed/unopposed)	0.20	100.00
12/13/2023	Luna Alvey Esq.	Receipt, Review, and Analysis	Receipt, review and analysis of court order granting extension of time to file answer.	0.10	40.00
12/15/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Answer and (8) Affirmative Defenses	0.70	350.00
12/15/2023	Brian H. Pollock Esq.	Email Communication	Draft email to Mr. Perez enclosing and regarding the FLSA Order and Statement of Claim and requesting the time and pay records for Ms. Chavez Letona to try and facilitate a settlement and/or narrowing of the issues and review file and FLSA Order re: Same	0.30	150.00
1/2/2024	Brian H. Pollock Esq.	Draft/revise	Draft/send Letter to Client About Trial Setting for: Maria Elena Chavez Letona eng and spa	0.40	200.00
1/2/2024	Luna Alvey Esq.	Receipt, Review, and Analysis	Receipt, review and analysis of Scheduling Order Setting Trial.	0.30	120.00
1/2/2024	Luna Alvey Esq.	Receipt, Review, and Analysis	Receipt, review and analysis of Order of Referral to Mediation.	0.30	120.00
1/3/2024	Steffany Sanguino	Paralegal	I emailed Oc suggesting mediators	0.20	33.00
1/4/2024	Steffany Sanguino	Paralegal	We have agreed with Neil Flaxman. I emailed OC with dates of availability from Mr. Flaxman's calendar.	0.30	49.50

1/4/2024	Steffany Sanguino	Paralegal	We have agreed to May 15 for mediation. I emailed the mediator's office to select the date.	0.20	33.00
1/4/2024	Brian H. Pollock Esq.	Draft/review	Draft RFAs to each of the corporate Defendants (x2) - 45 Requests Each	1.70	850.00
1/4/2024	Brian H. Pollock Esq.	Draft/review	Draft RFPs to Defendants	1.20	600.00
1/4/2024	Brian H. Pollock Esq.	Draft/review	Draft INTs to each Defendant (x5) - 2 corporate entities and three individuals	1.50	750.00
1/4/2024	Steffany Sanguino	Paralegal	Notice of mediation has been drafted and filed.	0.50	82.50
1/4/2024	Steffany Sanguino	Paralegal	A letter to the client enclosing the mediation date has been drafted in Spanish and English and emailed to the client,	0.50	82.50
1/4/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of the mediation engagement letter Mr. Flaxman circulated by email	0.20	100.00
1/4/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of engagement letter from Mr. Flaxman sent by email re: mediation on May 15, 2024	0.30	150.00
1/5/2024	Steffany Sanguino	Paralegal	The rule 26 has been drafted	1.50	247.50
1/5/2024	Steffany Sanguino	Paralegal	Bank statements have been redacted.	1.00	165.00
1/5/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Review the proposed materials to be produced	0.50	250.00
1/8/2024	Steffany Sanguino	Paralegal	Rule 26 disclosure has been finalized, documents have been combined and bate stamped, and a password was created with the link and sent to OC.	1.00	165.00
1/8/2024	Steffany Sanguino	Paralegal	We have propounded OC with our discovery request, INTS, RFPs and RFAs by email on Defendants.	0.40	66.00
1/9/2024	Steffany Sanguino	Draft/review	Draft Certificate of Interested Parties	0.40	66.00
1/9/2024	Brian H. Pollock Esq.	Draft/review	Revise the proposed Certificate of Interested Parties	0.20	100.00
1/22/2024	Steffany Sanguino	Paralegal	OC has propounded with their discovery request, INTS, and RFP.	1.00	165.00
1/22/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of the INTs and RFPs and N/Filing same	1.50	750.00
1/24/2024	Steffany Sanguino	Paralegal	A letter enclosing the discovery has been issued to the client, I drafted the first set of the discovery and texted the client to let her know we emailed them to her.	1.50	247.50
1/25/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Rule 26 Disclosures (filed of record)	0.30	150.00
1/25/2024	Steffany Sanguino	Paralegal	We received the Defendant's Rule 26, without documents.	0.30	49.50

1/30/2024	Brian H. Pollock Esq.	Legal	Conduct routine file audit to determine what needs to be done and document file re: same.	0.30	150.00
1/30/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Certificate of Interested Parties (none new/different disclosed)	0.20	100.00
1/30/2024	Steffany Sanguino	Paralegal	D's Certificate of Interested Parties has been reviewed and received.	0.10	16.50
1/31/2024	Steffany Sanguino	Paralegal	I called the client to f.u with her discovery answers. I also emailed the client to f.u.	0.10	16.50
2/5/2024	Brooks LaRou Esq.	Draft/revise	drafted the notice of appearance on behalf of Maria Chavez Letona	0.30	97.50
2/7/2024	Steffany Sanguino	Paralegal	Received and reviewed the client's discovery answers to the INTS	0.70	115.50
2/8/2024	Steffany Sanguino	Paralegal	A courtesy email has been issued to OC for their outstanding discovery answers.	0.10	16.50
2/8/2024	Steffany Sanguino	Paralegal	Responses to the Request for Admissions for Sweet Living Facility and Amor de Jesus have been received, reviewed, and downloaded.	1.00	165.00
2/8/2024	Steffany Sanguino	Paralegal	I started working on the second draft of the INTS answers.	0.60	99.00
2/8/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Defendants, Amor De Jesus and Sweet Living Facility's, Responses to Plaintiff's Requests for Admissions.	0.50	162.50
2/9/2024	Steffany Sanguino	Paralegal	Answers to the INTS have been translated and drafted.	1.00	165.00
2/9/2024	Steffany Sanguino	Paralegal	Received, downloaded, and reviewed the Defendant's discovery answers.	1.50	247.50
2/13/2024	Brooks LaRou Esq.	Draft/revise	drafted the introduction letter to send to client in English and Spanish	0.40	130.00
2/13/2024	Brooks LaRou Esq.	Federal Litigation - Plaintiff	Review of Defendants' responses to Plaintiff's first set of interrogatories, requests for admission, and requests for production.	1.00	325.00
2/13/2024	Steffany Sanguino	Paralegal	I called the client to clarify her answer to the INTS # 8.	0.18	29.70
2/13/2024	Brooks LaRou Esq.	Draft/revise	Review and revisions to draft of Plaintiff's responses to Defendants' interrogatories.	1.00	325.00
2/16/2024	Steffany Sanguino	Paralegal	I called the client to follow up with her answers to the RFP and witnesses for Sweet Living. I could talk to the client, but she asked me to email her daughter. I emailed the Daughter asking to provide us with the answers as soon as possible.	0.20	33.00
2/20/2024	Steffany Sanguino	Paralegal	I emailed the client to f.u with her discovery answers. We have the daughter's email address, so I texted the client.	0.16	26.40
2/20/2024	Steffany Sanguino	Paralegal	I emailed OC to request a discovery extension.	0.10	16.50
2/20/2024	Steffany Sanguino	Paralegal	I received an email from the client's daughter Yanny Soler in reference to the RFP answers. I forwarded the RFP to Ms. Soler and explained that the one they answered was the INTS not the RFP.	0.14	23.10
2/20/2024	Steffany Sanguino	Paralegal	We received a discovery extension until March 7	0.10	16.50
2/21/2024	Steffany Sanguino	Paralegal	I called the client to obtain details and information about the others	0.25	41.25

2/2/2024	Sanguino Brooks	Paralegal	who worked with her at both facilities.	0.25	41.25
2/22/2024	LaRou Esq.	Draft/review	Drafted Notice of Change of Address and Contact Information.	0.20	65.00
2/26/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Revise the proposed Answers to Interrogatories and Responses to RFPs and review file for same	1.20	600.00
2/26/2024	Steffany Sanguino	Paralegal	I called the client to f.u with the RFP answers and the phone numbers of the co-workers. no.a. I left a detailed v.m.	0.10	16.50
2/27/2024	Steffany Sanguino	Paralegal	Documents from the client have been received.	0.10	16.50
2/27/2024	Steffany Sanguino	Paralegal	I emailed the client's daughter to f.u with the answers to the RFP.	0.10	16.50
2/28/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Defendants' discovery responses and documents produced.	2.00	650.00
2/29/2024	Steffany Sanguino	Paralegal	I called the client to follow up with her answers to the RFP. She asked me to call her back in 30 minutes.	0.14	23.10
2/29/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Research regarding applicable Florida statutes and regulations governing assisted living facilities.	1.00	325.00
3/1/2024	Steffany Sanguino	Paralegal	I spoke with the client, and she provided me with all the phone numbers of the coworkers she had at Amor de Jesus and Sweet Living. I also explained to her how to export the chat from WhatsApp.	0.50	82.50
3/1/2024	Steffany Sanguino	Paralegal	I spoke with the client and we worked on her RFP answers.	0.30	49.50
3/4/2024	Steffany Sanguino	Paralegal	Chats with Aminta from 2022 have been received.	0.15	24.75
3/4/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Review of Florida statutes and regulations applicable to assisted living facilities.	3.00	975.00
3/5/2024	Steffany Sanguino	Paralegal	I am coordinating an appointment with the client to come into the office to export chats from her phone.	0.10	16.50
3/5/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Drafted conferral with counsel for Defendants regarding insufficient responses to Plaintiff's First Interrogatories and Requests for Production.	2.00	650.00
3/5/2024	Steffany Sanguino	Paralegal	I scheduled a meeting with the client for tomorrow at 12 pm.	0.10	16.50
3/6/2024	Brooks LaRou Esq.	Draft/review	drafted Notice of Deposition for Zelmira Quinonez for April 25th at 9am	0.30	97.50
3/6/2024	Brooks LaRou Esq.	Draft/review	drafted Notice of Deposition for Aminta Quinonez for April 25th at 2pm	0.30	97.50
3/6/2024	Steffany Sanguino	Paralegal	I met with the client in person. I downloaded text messages between Aminta and the client from WhatsApp, regular messages, and messages between Zelmira and the client.	3.50	577.50
3/6/2024	Brooks LaRou Esq.	Draft/review	Review and revisions to Plaintiff's Responses to Defendants' First Interrogatories and Requests for Production.	1.50	487.50
3/7/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Compiled documents to be produced in response to Defendants' First Requests for Production.	1.20	390.00

	Brooks LaRou Esq.	PLDO Plaintiff	Revisions to Plaintiff's Responses to Defendants' Interrogatories and Requests for Production.	0.30	
3/7/2024	Brooks LaRou Esq.	Phone Call	Phone call with client regarding her Responses to Defendants' Interrogatories.	0.75	243.75
3/7/2024	Steffany Sanguino	Paralegal	I emailed Oc requesting an extension.	0.10	16.50
3/7/2024	Steffany Sanguino	Paralegal	I organized the WhatsApp chat conversation with Aminta. I called the client to schedule a Zoom meeting tomorrow to notarize her documents. The client also informed me she has a notebook with the patients' names. As per Brooks request we asked for her to sent us pictures of it.	5.00	825.00
3/8/2024	Steffany Sanguino	Paralegal	I spoke with the client about today's Zoom meeting to notarize her answers to her discovery questions.	0.15	24.75
3/8/2024	Steffany Sanguino	Paralegal	Documents from the client have been received.	0.16	26.40
3/8/2024	Steffany Sanguino	Paralegal	Witnesses from the client have been received.	0.10	16.50
3/8/2024	Steffany Sanguino	Paralegal	Zoom meeting has been scheduled with the client for today at 12 to notarize her discovery answers.	0.14	23.10
3/8/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of information and documents sent from client 3/7/24 pertaining to Defendants' interrogatories and requests for production.	0.30	97.50
3/8/2024	Brooks LaRou Esq.	Draft/review	Final revisions to client's Responses to Defendants' Interrogatories and Requests for Production.	0.20	65.00
3/8/2024	Steffany Sanguino	Paralegal	Met with the client through Zoom to notarize her INTS.	0.30	49.50
3/8/2024	Steffany Sanguino	Paralegal	I organized the WhatsApp chats and regular messages with Aminta and Zelmira.	2.50	412.50
3/8/2024	Steffany Sanguino	Paralegal	Finalized organizing the WhatsApp chat between the client and Aminta	3.00	495.00
3/8/2024	Steffany Sanguino	Paralegal	Discovery answers have been notarized. Documents have been combined and date-stamped, and a password and expiration date created. All documents have been emailed to OC.	1.00	165.00
3/8/2024	Brian H. Pollock Esq.	Legal	Conduct routine file audit to determine what needs to be done and document file re: same	0.30	150.00
3/12/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants regarding conferral on deficient responses to Plaintiff's Requests for Production.	0.20	65.00
3/12/2024	Brian H. Pollock Esq.	Draft/review	draft re-nod of Aminta Quiñones	0.30	150.00
3/12/2024	Brian H. Pollock Esq.	Draft/review	draft re-nod of Zelmira Quiñones	0.30	150.00
3/15/2024	Steffany Sanguino	Paralegal	I called the client to find out about the other caretakers. The client told me about Marisela from Sweet Living and Lily from Amor. I explained to the client what we were looking to do, and she said she would contact them to let them know about it and get the ok so that we could talk to them.	0.20	33.00
	Brian H.				

3/18/2024	Pollock Esq.	Draft/review	Drafted re-NOD for Zelmira's deposition	0.20	100.00
Case 1:23-cv-24299-FAM Document 97-1 Entered on FLSD Docket 01/14/2025 Page 8 of 24					
3/18/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Magistrate Judge Torres' Standing Order on Discovery Procedures.	0.30	97.50
3/19/2024	Brooks LaRou Esq.	Draft/review	Drafted Plaintiff's Motion for Discovery Hearing.	0.60	195.00
3/19/2024	Steffany Sanguino	Paralegal	I returned the client's called, no. a left a VM.	0.10	16.50
3/20/2024	Steffany Sanguino	Paralegal	I spoke with the client, who confirmed she spoke with the other caretakers, who agreed to talk to us.	0.20	33.00
3/28/2024	Brooks LaRou Esq.	Draft/review	Drafted ltr to client re Deposition via zoom in eng and spa	0.40	130.00
3/28/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Notice of Taking Plaintiff's Deposition.	0.10	32.50
3/28/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants regarding Plaintiff's 4/18/24 deposition.	0.10	32.50
3/28/2024	Brooks LaRou Esq.	Draft/review	Revisions to draft letters to client regarding her upcoming deposition.	0.10	32.50
4/1/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Order Denying Plaintiff's Motion for Discovery Hearing.	0.10	32.50
4/3/2024	Steffany Sanguino	Paralegal	I spoke with the client about the hours she worked. The client told me that her daughter was helping her put together the hours since she was the one who would drop her off and pick her up or call an Uber.	0.20	33.00
4/4/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding rescheduling mediation.	0.10	32.50
4/5/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants regarding rescheduling mediation start time.	0.10	32.50
4/8/2024	Brooks LaRou Esq.	Draft/review	Drafted Plaintiff's Renewed Motion for Discovery Hearing.	1.00	325.00
4/8/2024	Brooks LaRou Esq.	Draft/review	Drafted Notice of Filing Exhibits to Plaintiff's Renewed Motion for Discovery Hearing.	0.30	97.50
4/8/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Conferral with Juan Aragon regarding setting Defendants' depositions.	0.10	32.50
4/9/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendant regarding cancellation/rescheduling of Zelmira Quinonez' deposition.	0.20	65.00
4/9/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt of email from counsel for Defendants regarding availability for deposition of Zelmira Quinonez.	0.10	32.50
4/9/2024	Brooks LaRou Esq.	Unassigned	Review of Florida Southern District Local Rules and Magistrate Judge Torres' Standing Order regarding discovery procedures in connection with Plaintiff's Renewed Motion for Discovery Hearing.	0.60	195.00

4/10/2024	Brooks LaRou Esq.	Communication	Review of email from counsel for Plaintiff regarding rescheduling deposition of Zelmira Quinonez.	0.10	32.50
4/10/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Conduct online research regarding each ALF sued in this case on AHCA's website to obtain relevant documents and information, including inspection history and deficiencies, including as related to staffing and documentation; then, draft email to AHCA requesting records pursuant to CH. 119, Fla. Stat.	1.00	500.00
4/10/2024	Brian H. Pollock Esq.	Draft/revise	Draft Motion to Compel and for Discovery Hearing regarding the depositions of Defendants and the outstanding discovery; conduct legal and factual research for same	2.10	1,050.00
4/10/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Plaintiff's Motion to Compel and/or for Discovery Hearing.	0.40	130.00
4/11/2024	Brooks LaRou Esq.	Email Communication	Receipt and review of email from counsel for Defendant regarding rescheduling depositions of Plaintiff and Zelmira Quinonez.	0.10	32.50
4/11/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Re-Notice of Taking Plaintiff's Deposition.	0.10	32.50
4/11/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of letter from counsel for Defendants (Emmanuel Perez) to Brian Pollock regarding rescheduling depositions of Defendants.	0.30	97.50
4/11/2024	Brian H. Pollock Esq.	Draft/revise	Draft ltr to client re deposition via zoom in eng and spa	0.40	200.00
4/11/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt of letter from Mr. Perez re: issues involving the depositions in this case; then, draft a rather detailed letter to him regarding those issues, confirming that any depositions not completed can be resumed, and my concerns with extending the discovery cut-off based on the dispositive motion deadline	1.80	900.00
4/11/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendant Zelmira Quinonez' Motion for Protective Order.	0.30	97.50
4/11/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Brian Pollock's letter to counsel for Defendants regarding rescheduling of depositions.	0.20	65.00
4/11/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Plaintiff's Re-Notice of Taking Depositions of Aminta and Zelmira Quinonez.	0.20	65.00
4/11/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Plaintiff's Response in Opposition to Defendant Zelmira Quinonez' Motion for Protective Order.	0.20	65.00
4/11/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of docket in connection with drafting Exchange's Motion to Quash Service of Process.	0.30	97.50
4/12/2024	Steffany Sanguino	Paralegal	Email exchange with the client about her witnesses.	0.10	16.50
4/12/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of letter from counsel for Defendants to Brian Pollock regarding Defendants' objection to re-taking depositions.	0.10	32.50
4/14/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Defendants' discovery responses in preparation for Defendant Jose Machado's deposition.	0.50	162.50

4/14/2024	LaRou Esq.	Receipt, Review, and Analysis	Initial review of Amor De Jesus AHCA documents: 9/21/21 Statement of Deficiencies, ADJ Facility Profile, Inspection Results	0.50	162.50
Case 1:23-cv-24299-PAM Document 97-1 Entered on FLSD Docket 01/14/2025 Page 10 of 24					
4/15/2024	Steffany Sanguino	Paralegal	I called the client to request the details of the dates and hours she worked.	0.15	24.75
4/15/2024	Brian H. Pollock Esq.	Depositions	Review file in preparation for deposing Aminta Quinonez and prepare outline for same; also, compile documents to potentially use as Exhibits	3.10	1,550.00
4/16/2024	Steffany Sanguino	Paralegal	I called the client back and asked her to estimate the dates and hours she worked. She said she was going to put it together and let me know.	0.25	41.25
4/16/2024	Brooks LaRou Esq.	Attendance at	Attendance deposition Aminta Quinonez to obtain information in preparation for deposing remaining Defendants	3.80	1,235.00
4/16/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Continued preparation for and then depose Aminta Quinonez until she advised that she needed to leave to help with her children; then, briefly discuss coordinating the continuation of her deposition with Mr. Perez	5.80	2,900.00
4/17/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft email to Mr. Perez re: the deposition of Mrs. Quinonez after he did not call this morning; also, call his office to discuss same	0.20	100.00
4/17/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Preparation for deposition of Zelmira Quinonez.	6.00	1,950.00
4/18/2024	Steffany Sanguino	Paralegal	Exhibits preparation for the deposition on Zelmira Quinonez.	1.00	165.00
4/18/2024	Steffany Sanguino	Paralegal	Exhibits preparation for the deposition of Zelmira Quinonez.	0.30	49.50
4/18/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Compiled exhibits for deposition of Zelmira Quinonez; final revisions to deposition outline.	3.00	975.00
4/18/2024	Brooks LaRou Esq.	Attendance at	Attendance at deposition of Zelmira Quinonez.	4.00	1,300.00
4/19/2024	Steffany Sanguino	Paralegal	Preparation of Exhibits for Jose Machado deposition.	0.26	42.90
4/19/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Preparation for deposition of Jose Machado.	3.50	1,137.50
4/19/2024	Brooks LaRou Esq.	Attendance at	Conducted deposition of Jose Machado.	1.75	568.75
4/19/2024	Steffany Sanguino	Paralegal	Received, reviewed and organized the clients hours	0.20	33.00
4/22/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants regarding rescheduling time and place of Plaintiff's deposition.	0.10	32.50
4/22/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Arragon regarding rescheduling of Plaintiff's deposition.	0.10	32.50
4/22/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Re-Notice of Taking Plaintiff's Deposition.	0.10	32.50
4/23/2024	Brooks LaRou	Receipt, Review, and Analysis	Review of letters to client regarding her 4/25/24 deposition; conferral with Juan Arragon regarding sending the same to client.	0.20	65.00

4/23/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Confer with Mr. Perez re: continuing trial and deadlines; then, draft Mot to Continue and proposed Order Granting	0.90	450.00
4/23/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Paperless Order granting Luna Alvey's Motion to Withdraw.	0.10	32.50
4/23/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Plaintiff's Agreed Motion to Continue Trial and Pretrial Deadlines.	0.20	65.00
4/24/2024	Brooks LaRou Esq.	Email Communication	Receipt of emails from counsel for Defendants regarding rescheduling Plaintiff's deposition.	0.20	65.00
4/24/2024	Steffany Sanguino	Paralegal	I called the client to notify her that the pre-depo and depo has been canceled and will be rescheduled.	0.14	23.10
4/24/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Order of Referral to Magistrate Judge Torres for all pretrial proceedings.	0.10	32.50
4/24/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Notice of Availability of Magistrate Judge Torres to exercise jurisdiction and appeal option.	0.20	65.00
4/24/2024	Steffany Sanguino	Paralegal	Spoke with the client about rescheduling her deposition.	0.10	16.50
4/24/2024	Steffany Sanguino	Paralegal	I called the client to confirm dates for her rescheduled deposition.	0.10	16.50
4/25/2024	Steffany Sanguino	Paralegal	Received Defs Re-NOD (24-0531 Pltf's depo)	0.10	16.50
4/25/2024	Brian H. Pollock Esq.	Draft/review	drafted ltr to client re deposition in person was rescheduled in eng and spa	0.40	200.00
4/25/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendant's Notice of taking Plaintiff's deposition.	0.10	32.50
4/29/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Paperless Order granting Agreed Motion to Continue Trial and Related Pretrial Deadlines.	0.10	32.50
5/3/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Magistrate Judge Torres' Paperless Order granting motions for discovery hearing [ECF No. 56].	0.10	32.50
5/3/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Paperless Order setting discovery hearing for 5/23/24 [ECF No. 57].	0.10	32.50
5/6/2024	Steffany Sanguino	Paralegal	I called the client to inform them about the mediation date and start time on May 15.	0.10	16.50
5/7/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt and review of email enclosing letter from Mr. Perez re settlement terms proposed by his clients; then, review the documents produced by AHCA and draft responsive email addressing the request to dismiss Mr. Machado and Zelmira Quinonez	0.50	250.00
5/7/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants requesting to reschedule discovery hearing.	0.10	32.50
5/7/2024	Brooks LaRou Esq.	Email Communication	Receipt of letter from counsel for Defendants (Emmanuel Perez) requesting dismissal of claims against Jose Machado.	0.10	32.50

5/7/2024	Steffany Sanguino	Paralegal	We received the Defendant's Unopposed Motion to reschedule the Hearing. An Order was submitted by OC as an exhibit.	0.10	16.50
5/7/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Motion to Reschedule Discovery Hearing.	0.10	32.50
5/7/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Paperless Order granting Defendants Motion to Reschedule Settlement Conference.	0.10	32.50
5/9/2024	Steffany Sanguino	Paralegal	Meeting with Brian and Brooks regarding strategies for this case.	0.10	16.50
5/9/2024	Steffany Sanguino	Paralegal	We received a Paperless Order granting agreed Motion to Continue Trial. Deadlines have been updated.	0.10	16.50
5/12/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Calculation of Plaintiff's damages in preparation for mediation.	1.00	325.00
5/12/2024	Brooks LaRou Esq.	Draft/review	Drafted confidential pre-mediation statement to Neil Flaxman, Esq.	1.50	487.50
5/13/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants (Emmanuel Perez) regarding settlement negotiations.	0.10	32.50
5/13/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendant Jose Machado's Motion for Summary Judgment.	0.30	97.50
5/13/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Statement of Material Facts in support of Motion for Summary Judgement.	0.20	65.00
5/13/2024	Steffany Sanguino	Paralegal	I called the client to remind her about the mediation coming up. I explained the process to her, and she confirmed that she needed a Spanish translator and requested for me to email the zoom link.	0.20	33.00
5/13/2024	Steffany Sanguino	Paralegal	The Zoom link for mediation has been emailed to the client again.	0.10	16.50
5/13/2024	Steffany Sanguino	Paralegal	Received and organized the Defendant's Motion for Summary Judgement and Statement of Material Facts in Support.	0.10	16.50
5/13/2024	Brooks LaRou Esq.	Phone Call	Phone call with client in preparation for mediation 5/15/24.	0.50	162.50
5/13/2024	Steffany Sanguino	Paralegal	I translated a mediation prep between the client and Brooks.	0.50	82.50
5/13/2024	Brooks LaRou Esq.	Draft/review	Revisions to calculation of damages based on 5/13/24 phone call with client.	0.30	97.50
5/13/2024	Brooks LaRou Esq.	Draft/review	Revisions to pre-mediation letter to Neil Flaxman.	0.30	97.50
5/14/2024	Brooks LaRou Esq.	Draft/review	Final revisions to draft of pre-mediation letter to Neil Flaxman.	0.10	32.50
5/14/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding sending pre-mediation letter to Neil Flaxman.	0.15	48.75
5/14/2024	Steffany Sanguino	Paralegal	Emailed OC to reschedule the depositions of Aminta and Zelmira.	0.10	16.50

5/15/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Preparation for 5/15/24 mediation with Neil Flaxman	3.00	650.00
5/15/2024	Steffany Sanguino	Paralegal	I attended the mediation to translate for the client.	3.50	577.50
5/15/2024	Brooks LaRou Esq.	Attendance at	Attendance at mediation.	2.00	650.00
5/15/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Videoconference with client regarding case status and next steps.	0.30	97.50
5/15/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Prepare for and then attend mediation; resulted in an impasse	3.50	1,750.00
5/16/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Mediator's Report.	0.10	32.50
5/17/2024	Steffany Sanguino	Paralegal	Receipt of the mediator's report	0.10	16.50
5/17/2024	Steffany Sanguino	Paralegal	I emailed Oc requesting dates before June 10th for the deposition of Zelmira and Aminta.	0.10	16.50
5/21/2024	Steffany Sanguino	Paralegal	File review marked off tasks.	0.10	16.50
5/21/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Magistrate Judge Torres' Standing Order Setting Discovery Procedures.	0.20	65.00
5/22/2024	Brooks LaRou Esq.	Draft/review	Drafted Proposed Order in connection with the parties' 5/23/24 Discovery Hearing.	0.60	195.00
5/22/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Preparation for 5/23/24 discovery hearing.	1.30	422.50
5/23/2024	Brooks LaRou Esq.	Unassigned	Additional preparation for 5/23/24 discovery hearing.	0.50	162.50
5/23/2024	Brooks LaRou Esq.	Phone Call	Phone call to office of counsel for Defendants requesting call-back to discuss proposed order compelling discovery and request for extension of time to respond to Defendant Machado's Motion for Summary Judgment.	0.10	32.50
5/23/2024	Brooks LaRou Esq.	Draft/review	Drafted Revised Omnibus Discovery Order following 5/23/24 discovery hearing.	0.50	162.50
5/23/2024	Brooks LaRou Esq.	Draft/review	Drafted Motion for Extension of Time to Respond to Defendant Machado's Motion for Summary Judgment.	1.00	325.00
5/23/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Emmanuel Perez) regarding request for extension to respond to Defendant Machado's Motion for Summary Judgment and contents of Proposed Order in connection with Plaintiff's Motion to Compel.	0.10	32.50
5/23/2024	Steffany Sanguino	Paralegal	The client texted us. I called her to discuss the deposition scheduled for next week. The client had a few questions and wanted to know the process. I explained everything to the client, and she confirmed Thursday and Friday.	0.30	49.50
5/23/2024	Brooks LaRou	Attendance at	Attendance at 5/23/24 discovery hearing.	1.30	422.50

5/24/2024	Steffany Sanguino	Paralegal	Receipt of Paperless Minute Entry for Proceedings held before the Chief Magistrate regarding the discovery hearing held on 5/23/24.	0.10	16.50
5/24/2024	Brooks LaRou Esq.	Draft/revise	Revisions to Revised Omnibus Discovery in connection with 5/23/24 discovery hearing.	0.20	65.00
5/24/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of letter from the office of counsel for Defendants regarding their objection to our request for extension to respond to Defendant Machado's Motion for Summary Judgment.	0.20	65.00
5/24/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Emmanuel Perez) regarding proposed Revised Omnibus Order in connection with 5/23/24 discovery hearing.	0.20	65.00
5/24/2024	Brooks LaRou Esq.	Draft/revise	Revisions to draft of Motion for Extension to respond to Defendant Machado's Motion for Summary Judgment.	0.30	97.50
5/28/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Order granting in part Plaintiff's Motion for Extension to respond to Defendant Machado's Motion for Summary Judgment.	0.10	32.50
5/28/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants objecting to language of Order Compelling Defendants' Discovery Responses.	0.10	32.50
5/28/2024	Brooks LaRou Esq.	Email Communication	Email to Magistrate Judge Torres with Revised Omnibus Discovery Order and noting Defendants' objections to the same.	0.10	32.50
5/30/2024	Steffany Sanguino	Paralegal	The client called; I returned the client's call, but no.a. I left a VM.	0.10	16.50
5/30/2024	Steffany Sanguino	Paralegal	Receipt of paperless order granting Plaintiff's MET re response to MSJ.	0.10	16.50
5/30/2024	Steffany Sanguino	Paralegal	Receipt of reset of the deadline for Plaintiff's MET to respond re D's MSJ. Response due by 6/27/24	0.10	16.50
5/30/2024	Steffany Sanguino	Paralegal	I called the client to confirm she's available to prep depositions at 4 pm. The client confirmed.	0.10	16.50
5/30/2024	Brooks LaRou Esq.	Unassigned	Preparation for deposition of Plaintiff.	0.50	162.50
5/30/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Meeting with client in preparation for her deposition 5/31/24.	2.00	650.00
5/30/2024	Steffany Sanguino	Paralegal	I attended the depo prep to translate the prep between the client and the attorney.	2.00	330.00
5/30/2024	Steffany Sanguino	Paralegal	I emailed the client a copy of her INT answers, the complaint, and the demand letter.	0.10	16.50
5/31/2024	Steffany Sanguino	Paralegal	I called the client to provide information about the deposition, but no. a. I left a VM and texted her to call me back.	0.10	16.50
5/31/2024	Brooks LaRou Esq.	Attendance at	Attendance at deposition of Plaintiff.	2.30	747.50
5/31/2024	Steffany Sanguino	Paralegal	The client called to see what was the next step in her case. I provided the client with an update.	0.20	33.00
5/31/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of letter from counsel for Defendants (Emmanuel Perez) regarding availability for continued depositions of Aminta and Zelmira Quinonez.	0.10	32.50
6/10/2024	Steffany	Paralegal	File review. I marked off tasks and issued a reminder to Brook	0.10	16.50

6/10/2024	Sanguino	Paralegal	regarding upcoming deadlines.	0.10	16.50	
6/13/2024	Case 1:23-cv-24299-FAM	Steffany Sanguino	Paralegal	I issued a reminder regarding the filing of the updated statement of claim	0.10	16.50
6/13/2024	Steffany Sanguino	Paralegal	The client called for an update. I let the client know we are in the process of rescheduling the depositions of the defendants.	0.20	33.00	
6/13/2024	Brooks LaRou Esq.	Unassigned	Re-calculation of damages in connection with preparing Plaintiff's Revised Statement of Claim.	0.70	227.50	
6/14/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiff's Amended Statement of Claim.	1.00	325.00	
6/14/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding filing Amended Statement of Claim.	0.10	32.50	
6/14/2024	Brooks LaRou Esq.	Unassigned	Conferral with Steffany Sanguino regarding serving Amended Statement of Claim by email.	0.10	32.50	
6/14/2024	Steffany Sanguino	Paralegal	I served our Amended Statement of Claim to OC.	0.20	33.00	
6/17/2024	Steffany Sanguino	Paralegal	A letter enclosing the amended statement of claim was drafted and emailed to the client.	0.30	49.50	
6/17/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Response to Amended Statement of Claim.	0.10	32.50	
6/20/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding ordering Plaintiff's deposition transcript.	0.10	32.50	
6/21/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Magistrate Judge Torres' Standing Order Setting Discovery Procedures in connection with requesting extension of time to conduct depositions of Zelmira and Aminta Quinonez, to respond to Jose Machado's Motion for Summary Judgment, and setting discovery hearing in connection with the same.	0.20	65.00	
6/21/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding scheduling discovery hearing before Magistrate Judge Torres.	0.20	65.00	
6/21/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiff's Second Motion for Extension of Time to Respond to Defendant Machado's Motion for Summary Judgment.	1.50	487.50	
6/21/2024	Steffany Sanguino	Paralegal	I emailed OC inquiring about their availability to arrange a discovery hearing.	0.10	16.50	
6/24/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiff's sworn declaration in support of her Response to Defendant Machado's Motion for Summary Judgment; research regarding individual liability under the FLSA in connection with the same.	0.80	260.00	
6/24/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiff's Statement of Material Facts in support of her Response to Defendant Machado's Motion for Summary Judgment.	1.50	487.50	
6/24/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiff's Response to Defendant Machado's Motion for Summary Judgment; conducted research in connection with the same.	4.50	1,462.50	
6/25/2024	Steffany Sanguino	Paralegal	The client called to let me know she received our correspondence regarding the amended statement of claim.	0.20	33.00	
6/25/2024	Steffany Sanguino	Paralegal	Email exchange with OC regarding a discovery hearing to be scheduled.	0.10	16.50	

6/26/2024	Brooks LaRou Esq.	Draft/review	Drafted Motion for Second Discovery Hearing.	1.30	422.50
6/26/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding filing Motion for Second Discovery Hearing.	0.10	32.50
6/26/2024	Brooks LaRou Esq.	Phone Call	Phone call with client regarding facts asserted in her sworn declaration, and next steps of case.	0.40	130.00
6/26/2024	Steffany Sanguino	Paralegal	I translated a conversation between attorney Brooks and the client regarding the affidavit. The client has confirmed that she agrees to the information applied.	0.40	66.00
6/26/2024	Brooks LaRou Esq.	Draft/review	Revisions to draft of Plaintiff's sworn declaration.	0.10	32.50
6/27/2024	Brooks LaRou Esq.	Teleconference with	Phone call with client regarding additional facts to include in Plaintiff's Sworn Declaration in support of her Response to Defendant Machado's Motion for Summary Judgment.	0.40	130.00
6/27/2024	Steffany Sanguino	Paralegal	I translated a conversation between the client and attorney Brooks regarding the affidavit and more information about Machado.	0.40	66.00
6/27/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Southern District's Local Rules in connection with preparing Plaintiff's Sworn Declaration, Statement of Material Facts, and Response to Defendant Machado's Motion for Summary Judgment.	0.20	65.00
6/27/2024	Steffany Sanguino	Paralegal	I translated the affidavit to the client. The client has confirmed she approves the information on it.	0.40	66.00
6/27/2024	Steffany Sanguino	Paralegal	I scheduled a Zoom meeting with the client to notarize the affidavit.	0.10	16.50
6/27/2024	Steffany Sanguino	Paralegal	Meeting with the client via zoom to notarize her declaration page.	0.40	66.00
6/27/2024	Brooks LaRou Esq.	Unassigned	Conferral with Hillary Frontado and Steffany Sanguino regarding interpreting Plaintiff's Sworn Declaration and signing the same.	0.10	32.50
6/27/2024	Brooks LaRou Esq.	Draft/review	Revisions to Plaintiff's Sworn Declaration in support of her Response to Defendant's Motion for Summary Judgment.	0.50	162.50
6/27/2024	Brooks LaRou Esq.	Draft/review	Revisions to Statement of Material Facts in support of Plaintiff's Response to Defendant Machado's Motion for Summary Judgment; compiled exhibits to be filed in connection with the same.	1.50	487.50
6/27/2024	Brooks LaRou Esq.	Draft/review	Final revisions to Plaintiff's Response to Defendant Machado's Motion for Summary Judgment; research in connection with drafting the same.	3.00	975.00
6/28/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Response to Plaintiff's Motion for Second Discovery Hearing.	0.30	97.50
7/5/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendant's Motion for Extension to file Response to Plaintiff's Statement of Material Facts.	0.10	32.50
7/10/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendant Machado's Reply to Plaintiff's Material Facts.	0.20	65.00
7/10/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendant's Reply to Plaintiff's Response to Machado's Motion for Summary Judgment.	0.30	97.50

7/12/2024	Steffany Sanguino	Paralegal	Receipt of Defendant's Motion for Extension of Time to respond to the Plaintiff's Statement of materials.	0.10	16.50
7/31/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Paperless Order granting Defendant's Motion for Extension to file Response to Plaintiff's Statement of Material Facts.	0.10	32.50
7/31/2024	Steffany Sanguino	Paralegal	Received Order GR [73] MET	0.10	16.50
7/31/2024	Brooks LaRou Esq.	Unassigned	Conducted research in connection with drafting Plaintiff's Motion for Adverse Inference.	1.80	585.00
7/31/2024	Brooks LaRou Esq.	Draft/revise	Began drafting Motion for Adverse Inference.	0.30	97.50
8/1/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Emmanuel Perez) regarding conferral on Motion in Limine and Motion for Adverse Inference.	0.40	130.00
8/5/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants regarding opposition to Plaintiff's Motion in Limine and Motion for Adverse Inference.	0.10	32.50
8/5/2024	Brooks LaRou Esq.	Draft/revise	Began drafting Motion for Spoliation Sanctions; research in connection with the same.	2.00	650.00
8/6/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding ordering expedited deposition transcripts for Aminta and Zelmira Quinonez.	0.10	32.50
8/6/2024	Brian H. Pollock Esq.	Legal	Review file and deadlines to determine additional strategy and information needed for case.	0.30	150.00
8/6/2024	Brooks LaRou Esq.	Draft/revise	Began drafting Motion in Limine.	0.80	260.00
8/7/2024	Brooks LaRou Esq.	Draft/revise	Continued drafting Motion for Spoliation Sanctions.	2.80	910.00
8/7/2024	Brooks LaRou Esq.	Unassigned	Research in connection with drafting Plaintiff's Motion in Limine.	2.50	812.50
8/8/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Conduct legal research and research in file to further revise the motion for spoliation sanctions	3.80	1,900.00
8/8/2024	Brooks LaRou Esq.	Draft/revise	Drafted Motion in Limine.	4.00	1,300.00
8/9/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiff's Sworn Declaration in support of Motion for Spoliation Sanctions.	0.40	130.00
8/9/2024	Brooks LaRou Esq.	Draft/revise	Research regarding entry of default as sanctions for spoliation; continued drafting Motion for Spoliation Sanctions.	2.00	650.00
8/9/2024	Brooks LaRou Esq.	Phone Call	Phone call with client regarding allegations in Sworn Declaration in support of Motion for Spoliation Sanctions.	0.40	130.00
8/9/2024	Steffany Sanguino	Paralegal	I translated a conversation between the client and the attorney regarding a declaration page.	0.40	66.00

8/9/2024	Brooks LaRou Esq.	Draft/review	Revisions to Plaintiff's Sworn Declaration in support of Motion for Spoliation Sanctions.	0.10	130.00
8/9/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Paperless Order referring Plaintiff's Motion to Compel Fact Information Sheets to Magistrate Judge Sanchez.	0.10	32.50
8/9/2024	Brian H. Pollock Esq.	Draft/review	Revise the proposed Declaration for Ms. Chavez Letona to be used in support of our motion for sanctions for spoliation of evidence	0.90	450.00
8/9/2024	Brooks LaRou Esq.	Phone Call	Follow-up call with client regarding allegations in her Sworn Declaration in support of Motion for Spoliation Sanctions.	0.20	65.00
8/9/2024	Brooks LaRou Esq.	Unassigned	Conferral with Steffany Sanguino and Hillary Frontado regarding translating client's Sworn Declaration in support of Motion for Spoliation Sanctions, and having client sign the same.	0.10	32.50
8/9/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Conduct additional legal research and then revise the draft of the MIL to include additional arguments and citations, citations of authority, and further build out the existing arguments	1.70	850.00
8/9/2024	Steffany Sanguino	Paralegal	Translated the declaration page to the client and emailed it to her for her electronic signature.	0.40	66.00
8/9/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of correspondence from counsel for Defendants (Emmanuel Perez) regarding the individual defendants' intent to file for bankruptcy.	0.10	32.50
8/9/2024	Steffany Sanguino	Paralegal	The declaration page has been received and signed by the client. Hillary signed as the interpreter, and I notarized it.	0.30	49.50
8/9/2024	Brooks LaRou Esq.	Draft/review	Continued drafting Plaintiff's Motion for Spoliation Sanctions.	3.00	975.00
8/9/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding filing Motion in Limine.	0.10	32.50
8/9/2024	Brian H. Pollock Esq.	Draft/review	Continue to conduct legal research and to draft/revise the Motion for Sanctions based on the spoliation of evidence by Defendants	1.20	600.00
8/14/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Response to Plaintiff's Motion in Limine.	0.40	130.00
8/16/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Further analyze Defendants' Response in Opposition to the Motion in Limine; begin to conduct legal research and to draft Reply regarding the issues of immigration status, tax filings/payments, prior/subsequent work, and Plaintiff's beliefs	2.80	1,400.00
8/21/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Order on Plaintiff's Motion for Second Discovery Hearing.	0.30	97.50
8/21/2024	Brooks LaRou Esq.	Draft/review	Finalized draft of Reply in support of Plaintiff's Motion in Limine; conducted research in connection with the same.	3.00	975.00
8/28/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Order Continuing Trial.	0.10	32.50
8/29/2024	Brian H. Pollock Esq.	Draft/review	Draft Letter to client re rescheduled trial eng and spa	0.40	200.00
9/10/2024	Steffany Sanguino	Paralegal	Issued reminder regarding the Exhibit List.	0.10	16.50

9/17/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiff's Trial Witness List.	0.40	130.00
9/17/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiff's Trial Exhibit List.	1.20	390.00
9/18/2024	Brooks LaRou Esq.	Phone Call	Phone call with judicial assistant to Judge Moreno regarding whether pretrial filing deadlines are extended in light of trial's continuance.	0.10	32.50
9/18/2024	Brooks LaRou Esq.	Email Communication	Email to Judge Moreno regarding whether pretrial filing deadlines are extended in light of trial's continuance.	0.40	130.00
9/19/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Emmanuel Perez) requesting to jointly file Motion for Extension of Pretrial Deadlines.	0.20	65.00
9/19/2024	Brooks LaRou Esq.	Draft/revise	Drafted Motion for Extension of Pretrial Deadlines and Proposed Order granting the same.	1.00	325.00
9/24/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Order denying Plaintiff's Motion for Extension of Pretrial Deadlines.	0.10	32.50
9/26/2024	Brooks LaRou Esq.	Draft/revise	Began drafting the parties' Joint Pretrial Stipulations.	1.00	325.00
10/8/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Order Denying Plaintiff's Motion for Reconsideration.	0.10	32.50
10/23/2024	Brooks LaRou Esq.	Draft/revise	Continued drafting Joint Pretrial Stipulations.	0.70	227.50
10/24/2024	Brian H. Pollock Esq.	Draft/revise	Revise the proposed Trial Witness List and add descriptions of anticipated testimony for several witnesses after reviewing file for the same	0.80	400.00
10/24/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft email to Mr. Perez re: and enclosing additional materials we received and/or downloaded from publicly available records from AHCA; review and organize same - and produce to avoid claim of prejudice if we seek to use them at trial and/or identify them on our Exhibit list	0.30	150.00
10/24/2024	Brian H. Pollock Esq.	Draft/revise	Begin to revise the proposed Trial Exhibit List and review file for same	0.40	200.00
10/25/2024	Brooks LaRou Esq.	Draft/revise	Revisions to trial witness list.	0.70	227.50
10/25/2024	Brooks LaRou Esq.	Draft/revise	Revisions to draft of Joint Pretrial Stipulations.	0.30	97.50
10/29/2024	Brooks LaRou Esq.	Unassigned	Compiled trial exhibits; revisions to trial exhibit list.	1.60	520.00
10/29/2024	Brooks LaRou Esq.	Draft/revise	Revisions to draft of Joint Pretrial Stipulations.	1.00	325.00
10/29/2024	Brooks LaRou Esq.	Draft/revise	Drafted jury instructions.	0.60	195.00

10/29/2024	LaRou Esq.	Draft/review	Drafted Jury Instructions.	0.00	195.00
Case 1:23-cv-24299-FAM Document 97-1 Entered on FLSD Docket 01/14/2025 Page 20 of 24					
10/29/2024	Steffany Sanguino	Paralegal	Compare the AHCA documents to the exhibits we had initially put together to ensure they were not repeated or that we were missing a document, separate them, combine them, date-stamped them, and create a Dropbox link emailed to OC.	2.00	330.00
10/29/2024	Steffany Sanguino	Paralegal	Review of the exhibits and exhibit list.	1.50	247.50
10/29/2024	Brooks LaRou Esq.	Draft/review	Revisions to draft of Trial Exhibit List.	0.20	65.00
10/29/2024	Brooks LaRou Esq.	Unassigned	Conferral with Steffany Sanguino regarding stamping and producing documents from AHCA to Defendants.	0.10	32.50
10/29/2024	Brooks LaRou Esq.	Draft/review	Revisions to draft of Trial Witness List.	0.30	97.50
10/29/2024	Steffany Sanguino	Paralegal	Revision of AHCA documents, combined, date-stamped, and created a dropbox link with expiration and password.	1.00	165.00
10/29/2024	Brooks LaRou Esq.	Draft/review	Continued drafting Proposed Jury Instructions.	0.80	260.00
10/29/2024	Brooks LaRou Esq.	Draft/review	Final revisions to draft of Trial Exhibit List.	0.60	195.00
10/29/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants sending Plaintiff's Trial Witness and Exhibit Lists, and requesting his objections to the same.	0.10	32.50
10/29/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Review our proposed Joint PreTrial Stipulation and then further revise same; also, draft an email to defense counsel asking for Defendants' witness and exhibit lists	0.94	470.00
10/30/2024	Brooks LaRou Esq.	Draft/review	Final revisions to draft of Pretrial Stipulations.	0.30	97.50
10/30/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants sending draft of Pretrial Stipulations.	0.10	32.50
10/30/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' proposed Trial Witness List.	0.10	32.50
10/30/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants regarding non-objection to Plaintiff's Trial Witness List.	0.10	32.50
10/30/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants regarding non-objection to Defendants' proposed Trial Witness List.	0.10	32.50
10/30/2024	Brooks LaRou Esq.	Draft/review	Revisions to proposed Jury Instructions.	0.40	130.00
10/30/2024	Brooks LaRou Esq.	Draft/review	Review of Defendants' revisions to draft of Pretrial Stipulations.	0.20	65.00
10/30/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Defendants' Trial Witness and Exhibit Lists.	0.40	130.00

10/30/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants regarding our objection to Defendants' proposed Trial Witness List.	0.10	32.50
10/30/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding filing Joint Pretrial Stipulations and exhibits thereto.	0.10	32.50
10/30/2024	Steffany Sanguino	Paralegal	Exhibit list review/adjusted.	1.50	247.50
1/3/2025	Steffany Sanguino	Paralegal	The client left me a voicemail requesting an update. I called the client and told her we have the trial commencing on January 13. we will inform her once we get confirmation or if we get a proposal for settlement.	0.30	49.50
1/6/2025	Steffany Sanguino	Paralegal	Conversation with the client regarding the calendar call scheduled for tomorrow, and the beginning of her trial period. I informed the client that she and her daughter need to be ready to testify next week.	0.30	49.50
1/6/2025	Brooks LaRou Esq.	Draft/revise	Revisions to proposed jury instructions and verdict form.	0.70	227.50
1/6/2025	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Response to Plaintiff's Notice of 90 Days Expiring.	0.10	32.50
1/6/2025	Steffany Sanguino	Paralegal	Trial Notebook preparation for the Calendar Call.	4.00	660.00
1/6/2025	Brian H. Pollock Esq.	Draft/revise	Draft Notice of 90 Days Expiring (M/Sanctions - Spoliation)	0.20	100.00
1/6/2025	Brian H. Pollock Esq.	FLSA - Plaintiff	Meet with Mr. LaRou to discuss pre-trial preparations and strategy in light of tomorrow's Calendar Call	0.40	200.00
1/6/2025	Brian H. Pollock Esq.	FLSA - Plaintiff	Meet with Ms. Sanguino, paralegal, to provide instructions for preparation of Trial Notebook, Exhibits, and for the potential trial in light of Calendar Call	0.40	200.00
1/7/2025	Steffany Sanguino	Paralegal	Trial Preparation.Gathered all Exhibits for trial.	3.00	495.00
1/7/2025	Steffany Sanguino	Paralegal	The client called to find information regarding the calendar call. I informed the client that the calendar call was scheduled for 2 pm. We will inform her once we have an update. I also explained it to her daughter.	0.30	49.50
1/7/2025	Steffany Sanguino	Paralegal	The client's daughter emailed us to provide us with her updated phone number. Records have been updated.	0.20	33.00
1/7/2025	Steffany Sanguino	Paralegal	I called the client to inform her of the outcome of the calendar call. The trial shall commence on Tuesday at 9 am.	0.20	33.00
1/7/2025	Brooks LaRou Esq.	Local travel	Travel from FairLaw Firm to Wilkie D. Ferguson Courthouse for calendar call.	0.40	130.00
1/7/2025	Brooks LaRou Esq.	Attendance at	Attendance at calendar call.	1.40	455.00
1/7/2025	Brian H. Pollock Esq.	Attendance at	Review the pending Motions (our MIL, our M/Sanctions-Spoliation, and Def Machado's MSJ), pre-trial stipulation, exhibit and witness lists, in preparation for Calendar Call. Then, attend Calendar Call - set for trial to commence on Tuesday, January 11, at 930am. Discuss potential for resolution with Mr. Perez outside of courtroom afterwards as well.	4.40	2,200.00

1/7/2025	Brian H. Pollock Esq.	FLSA - Plaintiff	Conduct legal research re: extent of bankruptcy stay involving not all Defendants and effect(s) of filing bankruptcy on Mr. Machado considering his work as a FINRA broker with Services 6 and 7 Licenses in preparation for my call with Mr. Perez tomorrow re: potential for resolution	0.60	300.00
1/10/2025	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Trial Management Order.	0.10	32.50
1/10/2025	Brooks LaRou Esq.	Phone Call	Phone call with bankruptcy counsel (Jesus Santiago) regarding the effect of the individual Defendants' filing of bankruptcy on the pending litigation, ability to collect on judgments against the corporate Defendants, and potential for lifting a stay of the proceedings.	0.50	162.50
1/10/2025	Brooks LaRou Esq.	Phone Call	Phone call with client regarding settlement authority.	0.20	65.00
1/10/2025	Brooks LaRou Esq.	Phone Call	Phone call with client confirming acceptance of Defendants' settlement offer and discussing next steps.	0.20	65.00
1/10/2025	Brooks LaRou Esq.	Phone Call	Phone calls with counsel for Defendants (Emmanuel Perez) regarding settlement negotiations.	0.30	97.50
1/10/2025	Brooks LaRou Esq.	Draft/review	Drafted Joint Notice of Settlement.	0.10	32.50
1/10/2025	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Emmanuel Perez) confirming Plaintiff's acceptance of Defendants' settlement offer, and attaching draft of Joint Notice of Settlement for his approval.	0.10	32.50
1/10/2025	Brian H. Pollock Esq.	FLSA - Plaintiff	T/c with Mr. Perez to discuss the potential for resolution	0.20	100.00
1/11/2025	Brooks LaRou Esq.	Draft/review	Drafted settlement agreement.	1.00	325.00
1/12/2025	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Emmanuel Perez) sending first draft of Settlement Agreement.	0.10	32.50
1/12/2025	Brooks LaRou Esq.	Draft/review	Drafted Joint Motion for Settlement Approval/Dismissal.	1.50	487.50
1/12/2025	Brooks LaRou Esq.	Draft/review	Drafted Proposed Order granting Parties' Joint Motion for Settlement Approval and Dismissal With Prejudice.	0.20	65.00
1/12/2025	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Emmanuel Perez) sending drafts of Joint Motion for Settlement Approval and Dismissal With Prejudice, and Proposed Order granting the same.	0.10	32.50
1/13/2025	Steffany Sanguino	Paralegal	Translated a conversation between the client and BL regarding the settlement agreement.	0.20	33.00
1/13/2025	Steffany Sanguino	Paralegal	I sent the settlement agreement to the client and texted her to inform her.	0.20	33.00
1/13/2025	Brooks LaRou Esq.	Phone Call	Phone call with client explaining terms of settlement agreement.	0.20	65.00
1/13/2025	Brooks LaRou Esq.	Email Communication	Receipt of email from office of counsel for Defendants (Olivia Reyes) sending signed Joint Motion for Settlement Approval.	0.10	32.50

1/13/2025	Brooks LaRou Esq.	Phone Call	Phone call with assistant to Defendant's counsel (Olivia Reyes) regarding Defendant's signature of Settlement Agreement.	0.10	32.50
1/13/2025	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of fully executed Settlement Agreement.	0.10	32.50
1/13/2025	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding filing Joint Motion for Settlement Approval/Dismissal.	0.10	32.50
1/13/2025	Steffany Sanguino	Paralegal	I received the client's settlement agreement signed.	0.10	16.50
1/13/2025	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Order granting Joint Motion for Settlement Approval and Dismissal.	0.10	32.50
1/13/2025	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Final Judgment Regarding Amount Owed to Plaintiff.	0.10	32.50

Services Subtotal: 84,696.80

**Expenses**

Date	Vendor	Category	Description	Total
11/9/2023	FairLaw Firm	Filing Fee - Federal Court		402.00
11/13/2023	FairLaw Firm	Service of Process	Service for Aminta Quiones	47.40
11/13/2023	FairLaw Firm	Service of Process	Service for Jose Machado.	47.40
11/14/2023	FairLaw Firm	Service of Process	Service for Amor De Jesus	47.40
11/20/2023	FairLaw Firm	Service of Process	Summons and Complaint to Zelmira Quinonez	47.40
11/20/2023	FairLaw Firm	Service of Process	Service for the Summons and Complaint to Sweet Living Facility	47.40
4/16/2024	FairLaw Firm	Interpretation / Translator Attendance	Spanish Interpretation of Aminta Quinonez's deposition	400.00
4/18/2024	FairLaw Firm	Interpretation / Translator Attendance	Zelmira Quinonez's deposition/late cancellation fee (less than 24hrs)	740.00
4/19/2024	FairLaw Firm	Court Reporter Attendance / Transcript Costs	Court reporter for Aminta Quinonez deposition	260.00
4/19/2024	FairLaw Firm	Court Reporter Attendance / Transcript Costs	Court reporter for Zelmira Quinonez deposition	260.00
5/7/2024	FairLaw Firm	Court Reporter Attendance / Transcript Costs	Court reporter for Jose Machado deposition	150.00
5/15/2024	FairLaw Firm	Mediation Fees to Mediator	Chavez Letona Mediation	787.50
8/20/2024	FairLaw Firm	Court Reporter Attendance / Transcript Costs	Original & One Certified Transcript of Deposition: Aminta Quinonez	470.75
8/20/2024	FairLaw Firm	Court Reporter Attendance / Transcript Costs	Original & One Certified Transcript of Deposition: Zelmira Quinonez"	551.65

Expenses Subtotal: 4,258.90

Please make all amounts payable to FairLaw Firm. Tax ID No.: 20-1722656.

Payment is due upon receipt.

